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Submitted via FCA website and by email to reg-comm@fca.gov

Ms. Laurie A. Rea Director, Office of Secondary Market Oversight Farm Credit Administration 1501 Farm Credit Drive McLean, Virginia 22102-5090

RE: ANPRM – RIN 3052-AC89 / Federal Register 79, No. 37 (February 25, 2014) 10426

Dear Ms. Rea:

Thank you for the opportunity to respond to the Farm Credit Administration's (FCA) Advance Notice of Proposed Rulemaking that was published in the February 25, 2014 Federal Register regarding Federal Agricultural Mortgage Corporation board governance and standards of conduct.

1<sup>st</sup> Farm Credit Services fully supports and endorses the comments submitted in response to this request by the Farm Credit Council, and urges FCA to adopt the Farm Credit Council's position on this matter, as set out in the Farm Credit Council's letter to FCA dated April 28, 2014.

We appreciate your consideration of our comments. If you have any questions, please feel free to contact us.

Sincerely,

1<sup>st</sup> Farm Credit Services

Greg J. Davis, Attorney